

David S. Musgrave, Esquire (VSB No. 35327)  
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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

In re:	)	
	)	Case No. 23-10566-KHK
EAGLE PROPERTIES AND INVESTMENTS,	)	
LLC,	)	Chapter 7
	)	
Debtor.	)	
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**RESPONSE OF FULTON BANK, N.A. TO MOTION TO APPROVE  
SALE OF 1001 MANNING DRIVE, FREDERICKSBURG, VIRGINIA  
FREE AND CLEAR OF LIENS, CLAIMS AND INTERESTS**

Fulton Bank, N.A. responds to the Chapter 7 Trustee's Motion to Approve Sale of 1001 Manning Drive, Fredericksburg, Virginia 22405 (the "Real Property") Free and Clear of Liens, Claims and Interests Pursuant to 11 U.S.C. Section 363(f) (Doc 527) as follows:

1. Fulton Bank, N.A. has a first priority deed of trust against the Real Property.
2. The proposed sale price of \$265,000.00 is sufficient to result in full payment of all amounts due to Fulton Bank, N.A. under its deed of trust, including interest to the date of payment and legal fees and expenses.
3. Fulton Bank, N.A. consents to the sale proposed by the trustee as long as Fulton Bank, N.A. is paid in full all amounts secured by its deed of trust against the Real Property at closing, which must occur within twenty days after court approval.

4. The sale should be free and clear of the deed of trust and the lis pendens claimed by Bala Jain, LLC because these liens are in bona fide dispute.

Dated: July 3, 2024

/s/ David S. Musgrave  
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**CERTIFICATE OF SERVICE**

I certify that on July 3, 2024, copies of the foregoing were served via CM/ECF to all parties receiving notice thereby.

/s/ David S. Musgrave  
David S. Musgrave